

Exhibit B

Exhibit B –Meta’s Substantial Narrowing of Disputed Topics

Global Limitations –

- “Social Media Platforms” limited to Facebook, Instagram, TikTok, Snapchat, YouTube, and Twitter/X.
- Meta will identify representative examples of documents and information it intends to ask about in advance of the deposition to the extent possible, as further detailed in Meta’s position statement.

Specific Topics

- Topic 2 - The State’s ~~use of Social Media Platforms including but not limited to advertisements, or promotions of, or by, the State or the State’s programs on, and posts on Social Media Platforms during the Relevant Period.~~
- Topic 3 - Programs, initiatives, efforts, or actions considered, proposed, taken by, and/or involving the State ~~(including without limitation any State agency)~~ to encourage, promote, or discourage the use of Social Media Platforms ~~by individuals under the age of 18~~ during the Relevant Period.
- Topic 4 - During the Relevant Period, programs, initiatives, efforts, or actions considered, proposed, taken by, and/or involving the State to address the use of Social Media Platforms by individuals under the age of 18, including without limitation:
 - a. Any program, initiative, effort, or action to discourage or prevent individuals under the age of 18 from using, or to decrease their usage of, Social Media Platforms; and
 - b. Any program, initiative, effort, or action to encourage or promote the use of Social Media Platforms by individuals under the age of 18.
- Topic 5 - The State’s ~~communications and/or~~ collaboration with any Social Media Platform on any program, initiative, effort, or other action related to, or directed at, ~~the use of Social Media Platforms by~~ individuals under the age of 18 ~~who use Social Media Platforms~~ during the Relevant Period.
- Topic 6 - The State’s ~~communications and/or~~ collaboration with any third party concerning any actual or ~~identified~~ potential program, initiative, effort, or other action related to, or directed at, the use of Social Media Platforms by individuals under the age of 18, and/or the mental, social, emotional, or behavioral health and wellbeing of individuals under the age of 18, during the Relevant Period.
- Topic 7 - Studies, reports, programs, initiatives, efforts, or actions proposed, taken by, or involving the State that sought to provide internet access or phones, computers, or other electronic devices to individuals under the age of 18 during the Relevant Period, ~~not including any colleges or institutes of higher learning.~~

- Topic 8 - Research, investigations, tests, studies, surveys, reports, evaluations, or analyses related to Social Media Platforms ~~that the State created, considered, relied on, or contributed to~~ during the Relevant Period, including without limitation the use of Social Media Platforms by individuals under the age of 18 and the potential benefits and/or harms created by the use of Social Media Platforms by individuals under the age of 18.
- Topic 10 - Any public or ~~identified~~ non-public meetings held by the State related to Social Media Platforms during the Relevant Period, including without limitation the use of Social Media Platforms by individuals under the age of 18.
- Topic 15 – Studies, research, tests, programs, initiatives, efforts, or actions ~~proposed, taken by, or involving the State~~ to address the mental, social, emotional, or behavioral health and wellbeing of individuals under the age of 18 ~~during the Relevant Period~~ (including, but not limited to, depression, anxiety, suicide, eating disorders, self-harm, loss of sleep, compulsive use of Social Media Platforms, and addiction) ~~that the State created, considered, relied on, or contributed to during the Relevant Period.~~
- Topic 17 – The State’s knowledge and/or understanding of different factors that impacted the mental, social, emotional, or behavioral health and wellbeing of individuals under the age of 18 during the Relevant Period, including but not limited to any assessment or evaluation of such factors by the State. For avoidance of doubt, this Topic includes, without limitation, the State’s knowledge and/or understanding of how the following factors impacted the mental, social, emotional, or behavioral health and wellbeing of individuals under the age of 18:
 - a. Social Media Platforms;
 - b. Video games usage;
 - c. Cell phone usage;
 - d. Messaging usage;
 - e. Usage of other electronics, applications, or internet sites apart from usage of Social Media Platforms;
 - f. COVID-19 and/or remote learning;
 - g. Use of drugs or alcohol;
 - h. The opioid and fentanyl epidemic;
 - i. Poverty, homelessness, lack of health insurance, and/or food insecurity;
 - j. Physical health including nutrition, exercise, weight management, sleeping habits, and sexual activity;
 - k. Family trauma or deaths;
 - l. Family dynamics, such as divorce, adoption, and foster care;
 - m. Academic pressure;
 - n. Violence, including school violence, gang violence, and domestic violence;
 - o. Bullying or verbal abuse apart from usage of Social Media Platforms;
 - p. Political polarization;
 - q. Physical and mental disabilities;
 - r. Natural disasters;
 - s. Climate change;
 - t. Discrimination and inequity; and/or

- u. Global warfare and conflict.
- Topic 18 – Mental, social, emotional, or behavioral health services provided by the State during the Relevant Period to individuals under the age of 18, including without limitation such individuals who use Social Media Platforms.
- Topic 19 - Budgeted and actual expenditures by the State during the Relevant Period related to the mental, social, emotional, or behavioral health and wellbeing of individuals under the age of 18, including without limitation such individuals who use Social Media Platforms.
- Topic 31 - The State's consideration, analysis, or views regarding any Social Media Platform directed at children under the age of 13, including without limitation a potential version of Instagram for children under the age of 13, **during the Relevant Period**.